

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

Case No.: 23-cv-61045-AHS

MAENETTE JARRETT, an individual,

Plaintiff,

v.

HOTEL EQUITIES GROUP, LLC., a
Foreign Limited Liability Company,
CHARLESTOWNE HOTELS, a South
Carolina Corporation,
ATLANTIC HOTEL GROUP ASSETS,
LLC, a Florida Limited Liability Company,
ATLANTIC HOTEL GROUP HOLDINGS,
LLC, a Florida Limited Liability Company,
THE ATLANTIC HOTEL
CONDOMINIUM ASSOC., INC., a Florida
not for Profit Corporation,
1602 ATLANTIC, LLC, a Florida Limited
Liability Company.

Defendants.

**THE ATLANTIC HOTEL CONDOMINIUM ASSOCIATION INC.'S RESPONSE TO
PLAINTIFF'S STATEMENT OF CLAIM**

Defendant, THE ATLANTIC HOTEL CONDOMINIUM ASSOCIATION, INC. (the
“Association”), pursuant to the Court’s Order Requiring Scheduling Report, Statement of Claim
and Response, and Referral to Magistrate Judge [D.E. 6], hereby files this Response to Plaintiff,
MAENETTE JARRETT’s (“Plaintiff”) Statement of Claim [D.E. 18], and states as follows:

1. The Association denies that it was or has ever been Plaintiff’s employer or joint
employer.

2. The Association further denies that Plaintiff is entitled to recover any purported unpaid overtime wages, liquidated damages, or any other damages from the Association whatsoever.

Dated: August 14, 2023

Respectfully submitted,

KAUFMAN DOLOWICH & VOLUCK, LLP

By: s/Joseph M. Cobo

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Counsel for Defendant, The Atlantic

Hotel Condominium Association, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing on this 14th day of August 2023, with the Clerk of the Court using the CM/ECF system which will automatically send a notice of electronic filing to all counsel of record.

/s/Joseph M. Cobo